

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

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FRONT RANGE EQUINE RESCUE,

et al.,

Plaintiffs,

v.

TOM VILSACK, Secretary,

U.S. Department of Agriculture, *et al.*,

Defendants.

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Civ. No. 1:13-cv-00639-MCA-RHS

DEFENDANT-INTERVENOR THE
CONFEDERATED TRIBES AND
BANDS OF THE YAKAMA NATION'S
DISCOVERY STATEMENT

DISCOVERY STATEMENT

Defendant-Intervenor, The Confederated Tribes and Bands of the Yakama Nation (“Yakama Nation”), by and through undersigned counsel, pursuant to this Court’s August 6, 2013, Discovery Order (Docket #99), hereby submits its Discovery Statement and states as follows:

1. Yakama Nation desires to conduct the following discovery in advance of the upcoming preliminary injunction hearing:
 - a. Not more than twenty (20) interrogatories to each Plaintiff. Yakama Nation requests that any Interrogatories be submitted within five (5) calendar days after entry of this Court's Scheduling Order and that responses be submitted within five (5) calendar days thereafter.

- b. Plaintiffs and Plaintiff-Intervenor to comply with Initial Disclosures required by Fed. R. Civ. P. 26(a)(1) within five (5) calendar days after entry of this Court's Scheduling Order;
 - c. Conduct in Albuquerque, New Mexico, the deposition of each individual Plaintiff and each corporate Plaintiff's Rule 30(b)(6) designee no later than August 23, 2013; and
 - d. The parties shall make any experts they intend to call available for telephonic deposition reasonably before the hearing.
2. No later than ten (10) calendar days prior to preliminary injunction hearing, each party should be required to file and serve its list of fact and expert witnesses it intends to call and all exhibits it intends to utilize at the Preliminary Injunction hearing.
3. Each party should be required to serve and file a summary of the opinions of each expert witness it intends to call at the Preliminary Injunction hearing no later than two (2) calendar days prior to such expert's deposition and no later than five (5) calendar days prior to the preliminary injunction hearing.

Dated: August 9, 2013

/s/ John Boyd
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Attorneys for the Yakama Nation

CERTIFICATE OF SERVICE

I CERTIFY that on the 9th day of August, 2013, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ John Boyd
John Boyd